



WESTINGHOUSE DIGITAL ELECTRONICS

V-CHIP RATINGS UPDATE TECHNOLOGY

COMPLIANCE PLAN

June 10, 2008

v.1.1

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BACKGROUND

Westinghouse Digital Electronics, LLC ("WDE" or the "Company") entered into a Consent Decree with the Federal Communications Commission ("FCC"), effective April 10, 2008 (the "Consent Decree"). Under Paragraph 8 of the Consent Decree pursuant to which the Company agreed to create and maintain a Compliance Plan through April 9, 2010 (the "Compliance Period") related to the implementation of V-chip technology in televisions that enable the device to adapt to new rating systems ("Ratings Update Technology").

This document sets forth the actions taken and to be taken by the Company to comply with the Consent Decree.

COMPLIANCE MEASURES

1. Customer Notification.

- (a) Email Notice. The Company's Marketing Department has assembled a list (based on consumer product registration cards) of the email addresses of consumers who purchased units determined by the Company as requiring upgrade to provide Ratings Update Technology. The Marketing Department has also drafted an email notice to advise such consumers of the availability of such update, attached hereto as Exhibit A. The Marketing Department will arrange for delivery of such notice to the affected consumers. Such delivery will be in batches so as to ensure timely availability of customer service agents who may be called to ask questions in response to the email notification. The size and frequency of the delivery batch will be adjusted depending on the amount of response generated. This notification process will be completed as soon as reasonably practicable.
- (b) Website Notice. A webpage notifying consumers about the Ratings Update Technology and models which may require update to obtain it has been created and gone live as of the date of this Compliance Plan (the "Compliance Webpage"). The webpage, a screen shot of which will be appended to this Compliance and set forth in Exhibit B, will be maintained by the Marketing Department through the Compliance Period.
- (c) Call Center Notification. The Company will cause its call center to provide a message to consumers who are on hold after calling the Company's customer service and technical support lines while waiting for a service representative, which message will provide information regarding the Ratings Update Technology. The text of the message to be provided to consumers is set forth on Exhibit C. The Customer Service Department has contracted with the Company's third party call center to implement such message-on-hold capability, and the message set forth in this paragraph is scheduled to be live on or before June 17, 2008.

2. Receiver Upgrades.

- (a) Identification of Affected Models and Serial Numbers. As of the date of this Compliance Plan, the Company has identified all models and serial numbers of individual products within a model type which are affected by this Compliance Plan, and the method of upgrade available to activate Ratings Update Technology in such device. A list of such models and serial number ranges is set forth in Exhibit D.
- (b) Implementation of Ratings Update Technology. As of the date of this Compliance Plan, the Company has established remedial actions (including creation of firmware) to enable activation of Ratings Update Technology in all affected models. The activation of Ratings Update Technology will require affected devices to be upgraded. There are three methods by which affected units may be upgraded to activate Ratings Update Technology.
 - i. Website Download. Most units of affected models may be upgraded to activate the Ratings Update Technology through downloading of appropriate firmware with upgrade instructions from the Company website. The upgrading process may be executed by the consumer.
 - ii. Call Center Firmware Distribution. In the event a consumer does not desire to obtain firmware for his or her affected device through the Company website, the consumer may request a copy of the firmware with upgrade instructions be delivered on a form of hard media specified by the Company.
 - iii. Service Center Upgrade. Some models of affected products require special equipment to effect the transfer of new firmware into the device, and cannot be upgraded by the consumer. In those cases, the upgrade will be performed by a Company service center.
 - iv. Product Replacement. Some models of affected products cannot be upgraded to activate Ratings Update Technology without substantial re-work. In those cases, the consumer will be afforded a replacement unit in which the Ratings Update Technology is activated.

Exhibit D lists which method applies to specific models and serial number ranges within models.

- (c) Website Download. As of the date of this Compliance Plan, the Company has created and put up a webpage in the support section of its website to enable consumers to download firmware into their devices which will activate Ratings Update Technology. The process of loading firmware with upgrade instructions has been implemented. The site will be managed by the Marketing Department. All firmware upgrades for each affected model, and modifications thereto, will be provided by the Product Management Department to the Marketing Departments for posting to the website.

- (d) Call Center Firmware Distribution. As of the date of this Compliance Plan, (i) the Company has acquired blank compact discs to load firmware requested by consumers in lieu of firmware download to address implementation of Ratings Update Technology for affected products, and (ii) a database of applicable firmware has been created by the Product Management Department. The Customer Service Department will receive calls for such media, produce the compact disc containing the appropriate data from the firmware database, and ship the compact disc to the requesting consumer.
 - (e) Service Center Upgrades. The Customer Service Department will manage requests for upgrades for models requiring an authorized service center to implement the Ratings Update Technology. Such requests will involve the issuance of a Return Material Authorization for repair of the unit by an authorized service center, which issuance will be subject to standard Company policy and procedure. The upgrade will be effected as a repair of the product by a Company service center, and will be managed as a repair in accordance with the Company's standard policy and procedure. The Product Management Department has concluded that no special parts are required to effect such repair; however, a special piece of equipment not currently available in all service centers is required. The Service Department will arrange for the provision of appropriate repair manuals and equipment to be delivered to authorized service centers. If an authorized service center does not have equipment necessary to effect the repair, the Service Department will arrange for transfer of the unit to a service center which can effect the repair in accordance with standard policy and procedure.
 - (f) Product Replacement. The Customer Service Department will manage requests for upgrades for models requiring product replacement in order to implement Ratings Update Technology. Such requests will involve the issuance of a Return Material Authorization for swap of the unit by the Company Service Center, which issuance will be subject to standard Company policy and procedure. The swap will be effected and delivered by the Company's RMA warehouse, in accordance with the Company's standard policy and procedure for product swaps. The Service Department will manage the availability of sufficient inventory for swap.
3. Product Management. The Product Management Department will take the following steps to assure that new products procured by the Company incorporate Ratings Update Technology:
- (a) Parts Procurement Specification. The Product Management Department will include specifications for the development and purchase of all new television models that require compliance with applicable all FCC standards. Such specifications will be included in all Parts Procurement Specification documents issued by the Product Management Department for new television models.

- (b) Design Review. From time to time the Company will conduct internal and external design reviews of its products. The Product Management Department will include compliance with FCC requirements as a criteria for such reviews.
- (c) Product Testing. Subject to the availability of adequate test equipment, the Product Management Department will include as part of its quality testing procedure for new and continuing products tests for compliance with applicable FCC standards relating to the implementation of Ratings Update Technology.
- (d) Productization Procedures. The Product Management Department will include, as part of its standard productization process, a line item calling for the identification, segregation, tracking and resolution of design and product issues specifically affecting the ability of a product to comply with the Ratings Update Technology. Applicable product management forms and procedures will be updated to include such line item.

COMPLIANCE OFFICER

The Company's Chief Technology Officer will be the executive responsible for overseeing implementation of this Compliance Plan and enforcement of applicable FCC requirements. Company departments which are responsible for elements of this Compliance Plan will provide such reports, operating procedures, flow charts and other information as may be requested by the Chief Technology Officer in order to assess and assure the implementation of this Compliance Plan. Issues regarding the interpretation of this Compliance Plan should be addressed to the Chief Technology Officer.

REPORTING TO THE FCC

The Company's Chief Technology Officer will file compliance reports with the FCC as may be required under the Consent Decree.

EFFECTIVE DATE

The effective date of this Compliance Plan is June 10, 2008. Activity under this Compliance Plan will continue through June 9, 2010.

EXHIBIT A

EMAIL NOTICE TO AFFECTED CONSUMERS

"All Westinghouse LCD HDTV's include a V-chip which permits selective blocking of television programming based on the content rating system in use today. In the future, there may be additional rating systems. Many of our TV's are already capable of using rating systems that have not yet been developed, but some are not. To determine whether your set is capable of using a new rating system and to obtain information about how to upgrade your set to use a new rating system, please click on the link below."

EXHIBIT B

WEBSITE NOTICE

LCD Flat Screen TVs | LCD HDTV vs Plasma TVs | Flat Panel TV Westinghouse - Microsoft Internet Explorer

Address: <http://www.wde.com/vchip/>

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The V-Chip

All Westinghouse LCD HDTVs include a V-Chip which permits selective blocking of television programming based on the content ratings system in use today.

The V-Chip feature allows for future updates of the content ratings system (although at this time we are unaware of any broadcasters or other program distributors who are using or planning to use a new content ratings system). A few Westinghouse TVs shipped without the ability to update the content ratings system in the event that such an update does take place. Westinghouse Digital is providing a firmware upgrade solution for those consumers who choose to enable the ability to update the content ratings system.


Please note that this update is not needed to operate your TV - the only purpose of the update is to allow the TV to use a new ratings system if one is developed.

If you wish to determine whether your TV is enabled with the capability to update the content ratings system, please see below:

If you do not see your model number or serial number range in either of the 2 sections below, your TV:

- 1) Already has the required V-Chip software for new content rating system that may become available in the future.
- 2) Has an NTSC tuner that does not require this software by FCC regulation.

To determine your serial number range, please use the last 5 digits of the serial number, found on the back of the TV.



Use the last 5 digits of the serial number

SECTION 1

If your TV is one of the listed models below you can upgrade your TV via our online firmware download program. You will be re-directed to our Firmware Upgrade Page and asked to enter your full Serial Number. If you do not feel comfortable with firmware downloads, please call 866-287-5555 for customer service help.

Model Number	Serial Number	Download Availability
SK-32H510S	All Numbers	July 18, 2008
SK-32H520S	All Numbers	July 18, 2008
W3213 HD	All Numbers	July 18, 2008
SK-40H590D	All Numbers	Available Now
SK-42H240S	All Numbers	July 18, 2008
SK-42H330S	All Numbers	July 18, 2008
LTV-46W1	All Numbers	July 18, 2008
SK-26H240S	7100001-73799999	Available Now
SK-26H520S	7100001-73799999	Available Now
SK-36H590D	7050001-74901482	Available Now
SK-32H240S	7010001-73599999	Available Now
SK-32H590D	7050001-74902450	Available Now
SK-40H520S	7380001-74601013	July 18, 2008
TX-42F430S	7170040-74900379	Available Now
TX-47F430S	7010000-74700001	Available Now
TX-52F480S	7010000-74599999	Available Now
LTV-27W7	6310000 or higher	July 18, 2008
LTV-32W4 HDC	6310000 or higher	July 18, 2008
LTV-32W6 HD	6310000 or higher	July 18, 2008
LTV-37W2 HD	6310000 or higher	July 18, 2008
LTV-40W1 HD	7240001 or higher	July 18, 2008

SECTION 2

If your TV is one of the models below, your TV does not have firmware download capabilities. Please call 866-287-5555 for further details.

Model Number	Serial Number
LTV-27W10 PRO	All Numbers
LTV-27W6 HD	All Numbers
LTV-32W12	All Numbers
LTV-32W12 PRO	All Numbers
LTV-32W3 HD	All Numbers
LTV-42W8 PRO	All Numbers
LTV-27W7	lower than 63100000
LTV-32W4 HDC	lower than 63100000
LTV-32W6 HD	lower than 63100000
LTV-37W2 HD	lower than 63100000
LTV-46W1 HD	lower than 63100000
LTV-40W1 HD	lower than 72400001
SK-19H210S	lower than 74004654

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Did the information on this page help you?

Done Internet

EXHIBIT C

TEXT OF MESSAGE TO CONSUMERS ON HOLD

"Please also be advised that certain LCD TV models require an upgrade to be able to respond to future changes in the V-chip content advisory ratings system. For more information, please go to www.westinghousedigital.com/vchip You will be connected to a representative shortly."

EXHIBIT D

AFFECTED MODELS AND UPGRADE METHOD

Table of Models, Serial Numbers and Upgrade Methods

Model	S/N Range that needs replacement	S/N Range that can be upgraded by firmware upload	S/N Range that needs the unit to be sent in for service	S/N Range that needs no firmware upgrade or service	Customer Service Route	Recommended Replacement Model (if necessary)	
						Primary	Secondary
SK-32H510S	n/a	All	n/a	n/a	Customer service directs the callers to go to firmware download page	n/a	
SK-32H520S	n/a	All	n/a	n/a			
W3213 HD	n/a	All	n/a	n/a			
SK-40H590D	n/a	All	n/a	n/a			
SK-42H240S	n/a	All	n/a	n/a			
SK-42H330S	n/a	All	n/a	n/a			
LTV-46w1	n/a	All	n/a	n/a			
SK-26H240S	n/a	71000001 ~ 73799999	n/a	73800000 or higher	. First identify the S/N with the customer. . If the S/N is in yellow range, direct customer to go to firmware download . All other S/N has no need for firmware upgrade or service	n/a	
SK-26H520S	n/a	71000001 ~ 73799999	n/a	73800000 or higher			
SK-26H590D	n/a	70600001 ~ 74901482	n/a	74901483 or higher			
SK-32H240S	n/a	70100001 ~ 73599999	n/a	73600000 or higher			
SK-32H590D	n/a	70500001 ~ 74902450	n/a	74902451 or higher			
SK-40H520S	n/a	73800001 ~ 74601013	n/a	74601014 or higher			
TX-42F430S	n/a	71700400 ~ 74900379	n/a	74900380 or higher			
TX-47F430S	n/a	70100000 ~ 74700000	n/a	74700001 or higher			
TX-52F480S	n/a	70100000 ~ 74599999	n/a	74600000 or higher			
SK-19H210S	n/a	n/a	lower than 74804654	74804655 or higher	. First identify the S/N with customer. If S/N is in green range, customer service direct the customer to send the unit in for service	SK-19H210S (w/firmware upgrade, if quick turnaround is necessary)	
LTV-27W7	lower than 63100000	63100000 or higher	n/a	n/a	. First identify the S/N with the customer . If the S/N is in red range, the unit need to be sent in for service (replacement) . If the S/N is in yellow	LTV-27w7 (S/N 63100000 or higher)	
LTV-32W4 HDC	lower than 63100000	63100000 or higher	n/a	n/a		LTV-32w4 HDC (S/N 63100000 or higher)	SK32H590D (w/firmware upgrade)

LTV-32W6 HD	lower than 63100000	63100000 or higher	n/a	n/a	range, direct customers to go to firmware download page	LTV-32w6 HD (S/N 63100000 or higher)	SK-32H510S/520S (w/firmware upgrade)
LTV-37W2 HD	lower than 63100000	63100000 or higher	n/a	n/a		LTV-37w2 HD (S/N 63100000 or higher)	
LTV-40W1 HD	lower than 72400001	72400001 or higher	n/a	n/a		LTV-40w1 HD (S/N 72400001 or higher)	SK-40H520S (w/firmware upgrade)
LTV-27W10 PRO	All	n/a	n/a	n/a	Customer service directs the calls to send the units in for service (replacement)	LTV-27w7 (S/N 63100000 or higher)	
LTV-27W6 HD	All	n/a	n/a	n/a		LTV-27w7 (S/N 63100000 or higher)	
LTV-32w12	All	n/a	n/a	n/a		LTV-32w6 HD (S/N 63100000 or higher)	SK-32H510S/520S (w/firmware upgrade)
LTV-32W12 PRO	All	n/a	n/a	n/a		LTV-32w6 HD (S/N 63100000 or higher)	SK-32H510S/520S (w/firmware upgrade)
LTV-32W3 HD	All	n/a	n/a	n/a		LTV-32w6 HD (S/N 63100000 or higher)	SK-32H510S/520S (w/firmware upgrade)
LTV-42W8 PRO	All	n/a	n/a	n/a		SK-42H240S (w/firmware upgrade)	SK-42H330S (w/firmware upgrade)

**Table of Firmware Upgradeable Models
Models, Serial Numbers and Firmware Versions**

Model Numbers	Part Number	Firmware Version Number	Instruction Guide	Serial No. Scheme
SK-26H520S	TW-50201-C026A	V26NMAW-UWA Ver.2.18 FA02 M64 H1068C D080422.rar	Firmware Upload #3	5020G71000001 - 5020G72699999
	TW-50202-C026A	V26NMAW-UWA Ver.2.18 FA02 M64 H1068C D080422.rar	Firmware Upload #3	5020G72700001 - 5020G73799999
	TW-50203-C026A	V26PMAW-UWB-FA08M05-0418_Buzzing Noise.rar	Firmware Upload #3	5020G73800001 - 5020G80499999
SK-26H240S	TW-50301-C026A	V26NMAW-UWA Ver.2.18 FA02 M64 H1068B D080422.rar	Firmware Upload #3	5030G71000001 - 5030G72699999
	TW-50302-C026A	V26NMAW-UWA Ver.2.18 FA02 M64 H1068B D080422.rar	Firmware Upload #3	5030G72700001 - 5030G73799999
	TW-50303-C026A	V26PMAW-UWA-FA08M05-0418_Buzzing Noise.rar	Firmware Upload #3	5030G73800001 - 5030G80499999
SK-26H590D	TW-50401-C026A	1.00.22	Firmware Upload #3	5040T70600001 - 5040T71599999
	TW-50401-C026A	1.00.22	Firmware Upload #3	5040J71600001 - 5040J74099999
	TW-50402-C026A	Combo26_HALFHIGHT_V024.tgz	Firmware Upload #3	5040J74100001 - 5040J74901482
SK-32H520S	TW-50501-C032A	Broadcom 3242	Firmware Upload #Broadcom	5050W00000000 - 5050W999999999
	TW-50501-C032A	N/A	N/A	5050J00000000 - 5050J999999999
	TW-50521-C032E	N/A	N/A	5052J00000000 - 5052J999999999
	TW-50521-C032E	N/A	N/A	5052W00000000 - 5052W999999999
SK-32H240S	TW-50601-C032A	Broadcom 3242 for 32inch model.rar	Firmware Upload #Broadcom	5060J00000000 - 5060J999999999
	TW-50601-C032A	Ver. 1.01.017 (X240)	Firmware Upload #3	5060W00000000 - 5060W999999999
	TW-50602-C032A	Ver. 1.01.019 (X241)	Firmware Upload #3	5060J00000000 - 5060J999999999
	TW-50602-C032A	Ver. 1.01.019 (X241)	Firmware Upload #3	5060W00000000 - 5060W999999999
	TW-50611-C032B	Ver. 1.01.019 (X241)	Firmware Upload #3	5061J00000000 - 5061J999999999
	TW-50621-C032E	Ver. 1.01.019 (X241)	Firmware Upload #3	5062J00000000 - 5062J999999999
	TW-50621-C032E	Ver. 1.01.019 (X241)	Firmware Upload #3	5062W00000000 - 5062W999999999
SK-32H590D	TW-50701-C032B	1.00.22	Firmware Upload #3	5070T70500001 - 5070T71299999
	TW-50701-C032B	1.00.22	Firmware Upload #3	5070J71300001 - 5070J73899999
	TW-50711-C032B	Combo32_HALFHIGHT_V024.tgz	Firmware Upload #3	5071J73900001 - 5071J74902450
	TW-50712-C032B		Firmware Upload #3	
SK-42H240S	TW-50901-L042C	Broadcom 3242 for 42inch model.rar	Firmware Upload #Broadcom	5090J00000000 - 5092J999999999
TX-42F430S	TW-51101-L042A	01_OSD_FW_V1.4.2.rar	Firmware Upload #2	5110J71700400 - 5110J799999999
	TW-51121-C042A	01_OSD_FW_V1.4.2.rar	Firmware Upload #2	5112J73401268 - 5112J74899999
	TW-51122-C042A	SusanII_v1.6.3.rar	Firmware Upload #2	
	TW-51122-C042A	SusanII_v1.6.3.rar	Firmware Upload #2	5112J74900380 - 5112J999999999
	TW-51123-C042A	SusanII_v1.6.3.rar	Firmware Upload #2	
TX-47F430S	TW-51211-C047A	01_OSD_FW_V1.4.2.rar	Firmware Upload #2	5121J73100998 - 5121J70000000
	TW-51212-C047A	SusanII_v1.6.3.rar	Firmware Upload #2	
	TW-51213-C047A	SusanII_v1.6.3.rar	Firmware Upload #2	5121J74002047 - 5121J999999999
TX-52F480S	TW-51301-C052A	01_OSD_FW_V1.4.2.rar	Firmware Upload #2	5130J73600014 - 5130J70000000
	TW-51302-C052A	SusanII_v1.6.3.rar	Firmware Upload #2	5130J73800025 - 5130J999999999
LTV-40w1HDC	n/a	X240_Samsung40L11_DVD_V071.tgz	Firmware Upload #3	C4001WSM0700000000 - C4001WSM07999999999
SK-40H590D	TW-52301-S040A	V40NSAW-UWA Ver.1.06 FA01.rar	Firmware Upload #3	5230Z74200001 - 5230Z81899999
SK-40H520S	TW-52801-S040A	V40PSAW-UWA-FA07M05-0122.rar	Firmware Upload #3	5280Z73800001 - 5280Z74601013
SK-42H330S	TW-52901-L042C	Broadcom 3242 for 42inch model.rar	Firmware Upload #Broadcom	5290J00000000 - 5290J999999999
SK-32H510S	TW-53001-C032A	Broadcom 3242 for 32inch model.rar	Firmware Upload #Broadcom	5300J00000000 - 5300J999999999
W3213HD	n/a	X240_CMO32L06_BF_071.tgz	Firmware Upload #3	W3213DET0600000000 - W3213DET06999999999
LTV-27W7 HD	n/a	X240_CMO27C1_V071.tgz	Firmware Upload #3	B2753DET0600000000 - B2753DET06999999999
	n/a	X240_CMO27L13_V071.tgz	Firmware Upload #3	C2754DET0600000000 - C2754DET06999999999
	n/a	X240_CMO27L03_V071.tgz	Firmware Upload #3	D2755DET0600000000 - D2755DET06999999999
LTV-32W4 HDC	n/a	X240_CMO32C5_V071.tgz	Firmware Upload #3	B3254DET0600000000 - B3254DET06999999999
	n/a	X240_CMO32L06_V071.tgz	Firmware Upload #3	C3257DET0600000000 - C3257DET06999999999
	n/a	X240_CMO32L04_V071.tgz	Firmware Upload #3	D3259DET0600000000 - D3259DET06999999999
LTV-32W6 HD	n/a	X240_CMO32C5_V071.tgz	Firmware Upload #3	B3253DET0600000000 - B3253DET06999999999
	n/a	X240_CMO32C4_V071.tgz	Firmware Upload #3	C3255DET0600000000 - C3255DET06999999999
	n/a	X240_CMO32L06_V071.tgz	Firmware Upload #3	D3256DET0600000000 - D3256DET06999999999
LTV-37W2 HD	n/a	X240_AU037V1_V071.tgz	Firmware Upload #3	A3751DEM0600000000 - A3751DEM06999999999
LTV-46W1 HD	n/a	X240_SAMSUNG46L03_V071.tgz	Firmware Upload #3	W4601DEM0600000000 - W4601DEM06999999999
	n/a	X240_SAMSUNG46WTL03_V071.tgz	Firmware Upload #3	A4650DEM0600000000 - A4650DEM06999999999